

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:19-cv-12551-FDS

**SECOND DECLARATION OF KEVIN GANNON
IN SUPPORT OF PLAINTIFF'S MOTION TO
MODIFY THE SCHEDULING ORDER**

I, Kevin Gannon, hereby declare as follows:

1. I am an attorney with the law firm Prince Lobel Tye LLP, attorneys for the plaintiff in this action, Singular Computing LLC ("Singular"). I submit this second declaration in support of Singular's motion to modify the scheduling order.
2. Attached hereto as Exhibit H is a true and correct copy of a document produced by Singular in this case as SINGULAR -00026942 (email from Johnny Chen to Joseph Bates dated June 24, 2011).
3. Attached hereto as Exhibit I is a true and correct copy of an excerpt from the transcript of a hearing before Magistrate Judge Cabell in this case on April 30, 2021.
4. Attached as Exhibit J is true and correct copies of additional status requests for attempts to serve and proof of service of Johnny Chen.
5. The foregoing is true and correct to the best of my current knowledge.

Executed under the pains and penalties of perjury of the United States of America at
Boston, Massachusetts on August 3, 2021.

/s/ Kevin Gannon